

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

ASHLEY COX, <i>et al.</i> ,	)	
	)	
PLAINTIFFS,	)	
	)	
v.	)	Case No: 3:21cv253-HEH
	)	
ELLEN MARIE HESS,	)	
in her official capacity as Commissioner	)	
of the Virginia Employment Commission,	)	
	)	
DEFENDANT.	)	
	)	

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**PLAINTIFFS' PETITION FOR AWARD OF ATTORNEYS' FEES**

Pursuant to Fed. R. Civ. P. 54(d) and this Court's January 6, 2022, Order (ECF 56 ¶ 6), plaintiffs Ashley Montgomery Cox, Emily Dimond, Penny Williams, Melissa Dimmerling, and Lenita Gibson, on behalf of themselves and all others similarly situated ("Plaintiffs"), respectfully petition this Court for entry of an Order awarding \$378,867 in attorneys' fees.

As set forth in the accompanying memorandum of law and declarations, Plaintiffs are "prevailing part[ies]" in this litigation for the purposes of 42 U.S.C. § 1988(b), and they have properly documented the hours reasonably incurred by their attorneys and the hourly rates that reasonably apply to those hours.

A proposed order is attached.

[signatures on following page]

Respectfully submitted,

Ashley Montgomery Cox, Emily Dimond, Penny Williams, Melissa Dimmerling and Lenita Gibson, on behalf of themselves and all others similarly situated.

By: \_\_\_\_\_/s/\_\_\_\_\_

Brenda Castaneda, VSB # 72809  
Patrick Levy-Lavelle, VSB # 71190  
Granville Warner, VSB # 24957  
**LEGAL AID JUSTICE CENTER**  
1000 Preston Avenue  
Charlottesville, Virginia 22903  
Telephone: (434) 977-0553  
Facsimile: (434) 977-0558  
Email: [brenda@justice4all.org](mailto:brenda@justice4all.org)  
Email: [pat@justice4all.org](mailto:pat@justice4all.org)  
Email: [cwarner@justice4all.org](mailto:cwarner@justice4all.org)

Steven Fischbach, VSB # 94280  
**VIRGINIA POVERTY LAW CENTER**  
919 East Main Street, Suite 610  
Richmond, VA 23219  
Telephone: (804) 351-5266  
Email: [steve@vplc.org](mailto:steve@vplc.org)

Daniel Turczan, VSB # 81551  
**LEGAL AID WORKS**  
500 Lafayette Blvd., Suite 100  
Fredericksburg, Virginia 22401  
Telephone: (540) 371-1105  
Email: [dturczan@legalaidworks.org](mailto:dturczan@legalaidworks.org)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day February, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record registered with the CM/ECF system, including the following:

William W. Tunner (VSB #38358)  
William D. Prince IV (VSB #77209)  
Michael G. Matheson (VSB #82391)  
John P. O'Herron (VSB #79357)  
Rachel W. Adams (VSB #92605)  
THOMPSON McMULLAN, P.C.  
100 Shockoe Slip, 3rd Floor  
Richmond, Virginia 23219  
Tel: (804) 649-7545  
Fax: (804) 780-1813  
[wtunner@t-mlaw.com](mailto:wtunner@t-mlaw.com)  
[wprince@t-mlaw.com](mailto:wprince@t-mlaw.com)  
[mmatheson@t-mlaw.com](mailto:mmatheson@t-mlaw.com)  
[joherron@t-mlaw.com](mailto:joherron@t-mlaw.com)  
[radams@t-mlaw.com](mailto:radams@t-mlaw.com)

By: /s/  
Granville Warner (VSB #24957)  
Legal Aid Justice Center  
1000 Preston Avenue  
Charlottesville, VA 22903  
Telephone: (434) 977-0553  
Facsimile: (434) 977-0558  
[cwarner@justice4all.org](mailto:cwarner@justice4all.org)

*Counsel for Plaintiffs Ashley Cox, et al.*